

DSS:MSA  
F.#2012R00879

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

JASON CARTER,  
STEVEN DOVE,  
FLOYD GOODSON,  
    also known as "G,"  
ELIJAH INGRAM,  
    also known as "EJ,"  
DENNIS JENKINS,  
    also known as "Meaty," and  
BENTLEY MARTIN,  
    also known as "Killa" and  
    "B,"

Defendants.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE  
(Narcotics Distribution Conspiracy)

1. On or about and between January 1, 2012 and May 22, 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JASON CARTER, STEVEN DOVE, FLOYD GOODSON, also known as "G," ELIJAH INGRAM, also known as "EJ," DENNIS JENKINS, also known as "Meaty," and BENTLEY MARTIN, also known as "Killa" and "B," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved: (a) a substance

I N D I C T M E N T

**CR 12 - 391**

(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(C), 846, 853(a) and  
853(p); T. 18, U.S.C. §§  
and 3551 et seq.)

U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

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containing heroin, a Schedule I controlled substance and (b) a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO  
(Distribution of Heroin)

2. On or about January 2, 2012, within the Eastern District of New York, the defendants BENTLEY MARTIN, also known as "Killa" and "B," and ELIJAH INGRAM, also known as "EJ," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE  
(Distribution of Heroin)

3. On or about January 10, 2012, within the Eastern District of New York, the defendant BENTLEY MARTIN, also known as "Killa" and "B," together with others, did knowingly and intentionally distribute and possess with intent to distribute a

controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOUR  
(Distribution of Heroin)

4. On or about January 18, 2012, within the Eastern District of New York, the defendants BENTLEY MARTIN, also known as "Killa" and "B," and ELIJAH INGRAM, also known as "EJ," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE  
(Distribution of Heroin)

5. On or about January 24, 2012, within the Eastern District of New York, the defendants BENTLEY MARTIN, also known as "Killa" and "B," and ELIJAH INGRAM, also known as "EJ," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance,

which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIX  
(Distribution of Heroin)

6. On or about February 1, 2012, within the Eastern District of New York, the defendant FLOYD GOODSON, also known as "G," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN  
(Distribution of Heroin)

7. On or about February 8, 2012, within the Eastern District of New York, the defendants BENTLEY MARTIN, also known as "Killa," and "B," and FLOYD GOODSON, also known as "G," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance,

which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT  
(Distribution of Heroin)

8. On or about March 14, 2012, within the Eastern District of New York, the defendant DENNIS JENKINS, also known as "Meaty," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT NINE  
(Distribution of Heroin)

9. On or about April 3, 2012, within the Eastern District of New York, the defendants DENNIS JENKINS, also known as "Meaty," and FLOYD GOODSON, also known as "G," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense

involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TEN  
(Distribution of Heroin)

10. On or about April 5, 2012, within the Eastern District of New York, the defendant FLOYD GOODSON, also known as "G," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT ELEVEN  
(Distribution of Heroin)

11. On or about April 11, 2012, within the Eastern District of New York, the defendants DENNIS JENKINS, also known as "Meaty," ELIJAH INGRAM, also known as "EJ," and JASON CARTER, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance,

which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWELVE  
(Distribution of Cocaine)

12. On or about May 22, 2012, within the Eastern District of New York, the defendants ELIJAH INGRAM, also known as "EJ," and STEVEN DOVE, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THIRTEEN  
(Distribution of Heroin)

13. On or about May 22, 2012, within the Eastern District of New York, the defendant FLOYD GOODSON, also known as "G," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled

substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

14. The United States hereby gives notice to the defendants that, upon conviction of any offense charged in the indictment, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of any such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any such offense, any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense.

15. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;



(d) has been substantially diminished in value;  
or

(e) has been commingled with other property which cannot be divided without difficulty;  
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described in this forfeiture allegation.

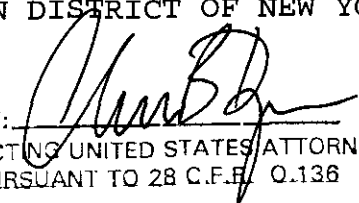
(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

  
FOREPERSON

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LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. § 0.136

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*JASON CARTER, STEVEN DOVE, FLOYD GOODSON, ELIJAH INGRAM, DENNIS JENKINS, and BENTLEY MARTIN,*

Defendants.

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**INDICTMENT**

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 846, 853(a) and 853(p); T. 18, U.S.C., §§ 2 and 3551 et seq.)

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*True Bill.*  
  
Foreman

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

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*Matthew S. Amatruda, Assistant U.S. Attorney (718-254-7012)*